

May 30, 2014

Thaddeus Moore Plaintiff

v.

Mt. Saint Joseph High School Defendant
4403 Frederick Avenue
Baltimore, Maryland 21229
Barry Fitzpatrick, Principal
Blake Henry, Football Coach

Xaverian Brothers Generalate Defendant
4409 Frederick Avenue
Baltimore, Maryland 21229

Now comes Thaddeus Moore, the father of Thaddeus Moore II, a 2011 graduate of Mt. Saint Joseph High School.

After much consideration and prayer, I find it necessary to bring the forthcoming suit. Since the beginning of his freshman year at Mt. Saint Joseph High School my son, Thaddeus Moore II, had been harassed based on unfounded reasons and disciplined by the principal, Barry Fitzpatrick. After my questioning and challenging Mr. Fitzpatrick on these incidences and complaining to the school's president as well as the Board of Directors and the Diocese, no actions were taken. Most of all of these incidents have been documented either by correspondence or email messages.

At that time, the Baltimore City Police and Child Protective Services had been notified that Barry Fitzpatrick was a pedophile who was targeting my child (See Exhibit H email to Michael Serene at Child Protective Services dated January 24, 2011). By January 2013, the principal Barry Fitzpatrick was forced to resign due to inappropriate contact / communication with a child at the school.

During the time that my son attended the school, the principal used athletic director Paul Triplett as a proxy when the principal wanted to interfere with student athletes' lives at the school. The principal would give the "orders" to coaches as to whether a child should or should not participate athletically, which was unwarranted if the child was academically eligible and presented no behavior problems. Such was the case with not only my son but also several others even at the critical times when Division I schools such as the University of Maryland and Michigan State University noticed Thaddeus and requested his football highlights and further information about him. Yet after the first game of his senior, the year of which Thaddeus starred in the game, he was not allowed to play in any other games thus negating any chance for a college scholarship. All of this came per the instructions of Barry Fitzpatrick, the

same person who the Plaintiff complained about continuously in 2011 in emails. This can be verified through the athletic director, Paul Triplett, who abruptly resigned in 2012. Let me reiterate that these same junior athletes were not permitted to play during games in their senior year based on the decision, by proxy, at the instructions of Principal Barry Fitzpatrick. Such denials to play with no obvious reasons were accompanied by verbal abuse and ambient abuse, which in my son's case came at the hands of Coach Blake Henry, the proxy. Parents were not even permitted a meeting with coaches or the staff. This rule was instituted and enforced by Barry Fitzpatrick and can be verified by the Office of Elijah Cummings. This suit seeks damages for pain and suffering, emotional distress, loss of potential future earnings for Thaddeus Moore II in the amount of \$10 Million US Dollars. He was unable to reach or show his full potential as an athlete since he was never allowed to play much during his high school years and especially during visits by universities' scouts. Please read the Attached Exhibits that document the events and dates that occurred.

In short, the Defendants did everything they could do to prevent Thaddeus Moore II from obtaining a college scholarship once the father, Thaddeus Moore I, complained the school continued its harassment of the student through unwanted continual conversations from Mr. Fitzpatrick and touching from Mr. Fitzpatrick.

May 30, 2014

A handwritten signature in black ink that reads "Thaddeus Moore". The signature is fluid and cursive, with "Thaddeus" on the top line and "Moore" on the bottom line.



Thaddeus Moore <thaddeusm090@gmail.com>

Fwd: Lack of Playing Time For Thaddeus Moore -- Four of Six

5 messages

Thaddeus Moore <thaddeusm090@gmail.com>

To: prbj1@juno.com

Bcc: csorrell@umd.edu

Mon, Nov 29, 2010 at 12:39 PM

Forwarded conversation

Subject: Lack of Playing Time For Thaddeus Moore

From: Thaddeus Moore <thaddeusm090@gmail.com>

Date: Tue, Oct 19, 2010 at 4:27 PM

To: bhenry@admin.msjnet.edu

Cc: barry@admin.msjnet.edu, paul@admin.msjnet.edu, jkelly@admin.msjnet.edu

Coach Henry, I am writing you regarding my son's lack of playing time in particular the last (4) games. After speaking with my son he tells me you say he isn't putting forth enough effort. My son and I disagree. At 6'2" 200lbs he is the biggest and fastest linebacker as a senior on the MSJ football team. I would like to set up a meeting with you, my son, and the President Brother James Kelly. The issue is simple. When Thaddeus has played in the linebacker rotation @ MSJ, a margin of victory is 25 points. When he has not played the margin of defeat is approximately 25 points. High School Football is a business; the object is to win. Is it not?

Sincerely,

Thaddeus Moore, Sr

From: <blakehenry@gmail.com>

Date: Tue, Oct 19, 2010 at 4:31 PM

To: Thaddeus Moore <thaddeusm090@gmail.com>

Mr. Moore,

I can not speak for Brother, but you, Thaddeus, and myself can meet any day this week and we can discuss why he isn't playing. I get to school at 7:30am. If that isn't convenient for you, just let me know when you would like to meet.

Coach Henry

Sent on the Sprint® Now Network from my BlackBerry®

From: Thaddeus Moore <thaddeusm090@gmail.com>

Date: Tue, 19 Oct 2010 16:27:53 -0400